



OPINION OF THE SCIENTIFIC COMMITTEE ON THE EEA SINGLE PROGRAMMING DOCUMENT 2026-2028

Article 8, paragraph 4-5 of the Regulation (EC) No 401/2009 of the European Parliament and of the Council of 23 April 2009 on the European Environment Agency (EEA), requires the Agency's Scientific Committee (SC) to be consulted on the Multi Annual Work Programme (MAWP) and on the Annual Work Programme (AWP), respectively, before their submission by the Executive Director to the Management Board for adoption.

In the 90th Scientific Committee (SC) meeting on 25-26 February 2025 (Doc. EEA/SC/90/01), the SC was invited to provide its opinion on the draft Single Programming Document (SPD) for the multi-annual period 2026-2028.

Following discussions at the 91st SC meeting on 20-21 May 2025, the SC agreed the following:

Introduction

The SC welcomes the draft Single Programming Document (SPD) 2026-2026 and the extensive and structured feedback received on the Committee's Opinion on the SPD 2025-2027 (Doc. EEA/SC/89/4.3).

Overall, the draft SPD 2026-2028 has a clear structure, covers the EEA's mission, explains the context in which the Agency operates, structures activities by core work area and type of services, presents new tasks, and how different agreements are developing. The draft SPD describes the strategic objectives and concrete activities, including the annual work programme. The big picture of the EEA's many tasks, partnerships and plans is understandably complicated to capture in a single document, such as the planned work and contributions of the ETCs.

The Committee would like to submit the following comments and recommendations.

Overarching comments

1. **Changing political landscape.** The challenges arising from the recent changes in the policy landscape, both within the EU and internationally, together with slow progress and in many cases worsening prospects for reaching set targets (e.g. LULUCF) could be brought more to fore, as this can be expected to affect the EEA as well, and to reinforce the necessity for the EU to remain committed to the European Green Deal (EGD). The recent significant political shifts, including environmental backlash, and growing calls for regulatory simplification and delays in implementation, geopolitical developments that weaken multilateral collaboration and slow progress in international negotiations, as well as economic challenges have driven the EU to adopt the Competitiveness Compass and urgently reassess security concerns. These developments can be expected to lead to a more constrained context than when the EGD was originally conceived. How these may impact expectations on the EEA and its possibility to deliver and frame the next few years' enablers and needs,



including the need for factual information, could be fleshed out with some additional content. The draft SPD touches for now rather lightly on this, at the end of Section 2.1

2. **The SPD could be complemented by illustrations, to further improve clarity.** For example, in (2.2.3), a table or a figure could replace or support the text presenting the SLAs. In (3.1.2, 3.2.1), a timeline could be useful to illustrate the duration of the SPD alongside key ongoing events—such as the second half of the 2021–2030 strategy, the evolving EU policy cycle, and the next MFF cycle.
3. **Comprehensive Quality management.** In the previous SC opinion on the SPD (for 2024–2026), concern was raised about the apparent lack of a comprehensive quality management system (QMS) at the EEA. The SC notes a brief mention in Annex 6. The present draft SPD is thus not very clear about how and whether the work planned by the EEA has progressed and what may come next. The
 - a. **Adequacy of budgetary allocation by the EU institutions.** The SC reiterates its concerns that the Agency’s capacity to engage and deliver on the European Green Deal (EGD) continues to suffer from shortness of resources, among others with respect to support staff in relation to the overall activities and their evolution. The SC welcomes the Agency’s efforts on efficiency gains both in this context and as such. It could be explained whether efficiency gains and/or further development of collaboration with other European institutes (not least JRC) can to some degree ameliorate the resource issues.
 - b. **The SC notes that many aspects of KPIs are still under consideration,** and refers to the previous opinion for possible input.

Specific comments

4. **3.1.1** It is not entirely clear how the new three core work areas (environment, climate, sustainability) and the main services replace the original five areas of work outlined in the EEA-Eionet 2021–2030 strategy. A visual representation could help illustrate the shift from the initial organisation to the current organisation.
5. **3.1.1.** SOER is mentioned here in relation to the sustainability core work area. However, it is not mentioned later in the SPD under the two other core work areas. While this may reflect how the work is organized, it would seem to be appropriate to also acknowledge the SOER under the two other core work areas.
6. **3.1.1 (page 15):** Providing a clear definition of each type of service is essential, as the EEA's activities are structured according to the ‘delivery model’ throughout the remainder of the document. A subsection title could be **added, with something like ‘Developing a service culture’ to better reflect its focus.**
7. **3.2.2** This subsection could also appear in Section 1 of the report (*Mission, Mandate, Management and Organisation*), as it is unclear why the presentation of Eionet and the EEA Scientific Committee is included in the multi-annual programme. A brief description of the seven ETCs and their mission would also be useful to include, for



completeness, and to provide framing for the Annex 13 that is to explain ETC action plans 2026.

8. **3.2.2** The paragraph on the Scientific Committee could be rephrased for greater clarity, such as *The EEA Scientific Committee comprises up to 20 independent scientists from EEA member countries, selected through an open process to ensure expertise in areas critical to the agency's work. Members are appointed for a four-year term, renewable once. In January 2025, half of the committee's membership was renewed. The Scientific Committee supports the Executive Director and the EEA Management Board by providing scientific advice on the agency's work areas. Additionally, it is required to provide an opinion on the draft EEA Single Programming Document and the recruitment of scientific staff. The committee's chair serves as an observer on the Management Board.*
9. **3.3.4** (page 31) Only one (Pollution and Health) of the three core areas is mentioned in this context. Are there relevant actions or suchlike also on the other core areas?
10. **3.3.4** A critical analysis of the full range of effects is needed for AI and Digitalisation. While the benefits are undeniable, the costs, risks, and challenges associated with AI must also be assessed. Additionally, the assumption that AI will naturally lead to increased transparency is not self-evident and should be acknowledged.
11. **4.2** The role and contribution of the ETCs is very briefly covered and given their significant roles, some further discussion could be considered here (and appropriate references, such as to Annex 13. Could also consider adding a line to the table providing an overview of the activity to highlight partnerships with other institutional bodies (e.g., other agencies, JRC), either before or after the 'ETC involvement' line. This applies to the each of the three core work areas.
12. **4.3** (page 52) In the activity description, agriculture (LULUCF and AFOLU are not the same) is not mentioned among the sectors covered by data on climate change mitigation and neutrality. Is this deliberate or an oversight?
13. **4.2-4.4** The role and expectations on the SC are largely absent from work programme activities. There is a mention under Sustainability (page 65), but the same would reasonably apply to the other two work areas as well. Alternatively, if only generic descriptions are relevant, there could be some mention in connection to the describing of the SC.
14. **4.5** The four bullet points are good examples of "cross-cutting activities", but what then follows in 4.5.1-4.5.4 would seem to be something more like shared supporting functions (such as communication), or shared elements of the delivery model.

Copenhagen, 20 May 2025

[Signed]

Louis Meuleman,
Chair of the Scientific Committee